

EXHIBIT 6

1 I'm getting ahead of myself, but --

2 Q. That's okay. Go ahead.

3 A. Basically he wanted to see if Troy would
4 admit that there was indeed a videocamera present at
5 the incident.

6 Q. And when you say "present at the incident,"
7 you mean the incident involving Mr. Raymond?

8 A. Correct.

9 Q. What exactly did the investigator say to you
10 about videocameras in the Matthew Raymond incident?

11 A. He just asked me if there was a video taken
12 of the incident with Mr. Raymond. And he said that
13 there was not, you know, that Troy Mitchell and the
14 other defendants stated that there was not a video and
15 asked me if there was one.

16 Q. And what did you say to the investigator?

17 A. I told him there was one.

18 Q. And how did you know there was a videotape of
19 the incident involving Mr. Raymond?

20 A. Because I was present at that time.

21 Q. Okay. And who was taking the video recording
22 that you saw?

23 A. Sergeant Harte.

24 Q. We are going to dive into all this in a
25 little more detail in a bit. But did you see Sergeant

1 Harte taking a video recording in a First Aid room in
2 the medical wing of Auburn Correctional Facility?

3 A. I was asked to leave that room.

4 Q. Okay. So let me ask the question a different
5 way. Where were you and where was Sergeant Harte when
6 you saw him taking a video recording of Mr. Raymond?

7 A. I was in the First Aid area, and then they
8 call it a truck trap. That's where they come back to
9 the trucks or vans or buses. And then they come
10 through directly to the First Aid area.

11 Q. Okay.

12 A. So I did see him videotaping as Matthew
13 Raymond walked through the door and into the First Aid
14 room.

15 Q. Okay.

16 A. We call it the exam room.

17 Q. And at that point, Mr. Raymond was in a black
18 box and shackled?

19 A. I do not know if he was in a black box, but
20 he was definitely in handcuffs.

21 Q. Okay. And when you watched Mr. Raymond walk
22 into the exam room, what happened next?

23 A. Well, it didn't start out roughly to begin
24 with. Troy and Mr. Raymond were yelling at one
25 another, throwing obscenities back and forth and went

1 into the First Aid room.

2 Q. And then what?

3 A. And then because he had just come back to
4 Auburn Correctional Facility from Auburn Community
5 Hospital, they send discharge paperwork for the patient
6 which in this case would have been Matthew Raymond.
7 And we leave the folder of people that may be out to
8 other facilities, we leave their file at a desk in the
9 nurse's station. So I skimmed over the discharge
10 paperwork, grabbed his file, and went in to assess him
11 in the exam room.

12 Q. When you saw Mr. Mitchell and Mr. Raymond
13 yelling at each other, where exactly were you in
14 relation to them?

15 A. I would have been in the nurse's station.

16 Q. And from the nurse's station -- withdrawn.
17 Let me ask it a different way.

18 Where is the nurse's station relative to the
19 exam room?

20 A. I couldn't tell you how far away it is, but
21 it's in the same area. If I had to guess, and this is
22 only a guess, I would say it was 20 to 25 feet away
23 from the doorway in the nurse's station to that
24 doorway.

25 Q. Okay. And from where you were in the nurse's

1 station, you had a clear view at that time to the
2 entrance and exit to the exam room?

3 A. Yes, I did.

4 Q. Okay. So immediately after you saw
5 Mr. Mitchell and Mr. Raymond enter the exam room
6 yelling at one another, you took the discharge papers
7 and went into the exam room yourself; is that right?

8 A. Correct.

9 Q. Okay. What did you see at that point?

10 A. He was sitting on the edge of the exam table.
11 And they just continued yelling at one another. And
12 that is when Troy Mitchell told me I needed to leave
13 the exam room.

14 Q. And what did you do at that point?

15 A. I went back to the nurse's station, skimmed
16 through more of, you know, the discharge paperwork. I
17 usually do that in front of the client, or the inmate,
18 however you want to refer to him. You know, just skim
19 through, see why he went out, what was, you know, what
20 was their actual, what did they do at the hospital?
21 You know, did they run lab work? Did they -- it's just
22 not cumulative; discharge paperwork.

23 Q. And when you were in the exam room before
24 Mr. Mitchell told you to leave, did you see Sergeant
25 Harte still holding the videocamera at that point?

1 Mr. Raymond in that minute or so other than he was
2 wearing greens at the time?

3 A. Well, like I said, they were just yelling at
4 one another. There was no marks on him whatsoever.

5 Q. Okay. So you didn't see any marks on his
6 face?

7 A. No, not at that time.

8 Q. Did Lieutenant Mitchell tell you why he asked
9 you to leave the exam room?

10 A. No, he did not.

11 Q. Why did you think Mr. Mitchell was telling
12 you to leave the exam room?

13 A. Because it seemed to be a hostile
14 environment, and usually they don't want us in there
15 when it's hostile. I mean, we as nurses could be
16 injured.

17 Q. And you obeyed Mr. Mitchell's request and you
18 left the exam room right away?

19 A. Yes, I did.

20 Q. Had Mr. Mitchell ever asked you in a similar
21 circumstance to leave an exam room before while there
22 was an inmate in the exam room?

23 A. No, he has not.

24 Q. Any other officers or staff at the prison
25 make that request of you?

1 Q. Okay. So let's talk through September 14,
2 2016. You were that day a Nurse 2 at Auburn
3 Correctional Facility?

4 A. Correct.

5 Q. As a Nurse 2, did you get specifically daily
6 assignments or was your job the same day to day in
7 terms of where you went and what you did?

8 A. It depends on who was there. My actual
9 position was it transit.

10 Q. And what is transit?

11 A. Transit is where inmates come in by the
12 buses, you know, from different prisons. And some are
13 just, you know, stopping in for the night or, you know,
14 if it's a Tuesday night, there is no transit on
15 Wednesday. And then they leave Thursday morning to go
16 to other facilities. Some of those people are actually
17 coming to Auburn to stay at Auburn.

18 Q. And is it your job with those inmates to
19 evaluate their health either before they move on or
20 before they stay at Auburn?

21 A. Correct. And if they needed scrips or
22 anything, that's my job to make sure that the doctor
23 orders those scrips.

24 Q. Okay. And were you doing transit work on
25 September 14, 2016?

1 A. I honestly don't know, because if it was a
2 Wednesday -- this is the best I can explain it.

3 Q. That's okay.

4 A. If it was a Wednesday, I would have been
5 either the med nurse or the infirmarium nurse. If it was
6 a weekend, and I worked every other weekend, I was
7 generally the infirmarium nurse or depending on who I was
8 working with, sometimes they didn't want to do meds, so
9 I would go to that job. So I kind of had my own job,
10 but I floated.

11 Q. So if I represent to you in this deposition
12 that September 14, 2016, was a Wednesday, it sounds
13 like you would have been either a med nurse or an
14 infirmarium nurse that day?

15 A. Or I could have been an extra nurse.

16 Q. And what's the difference between a med nurse
17 and an infirmarium nurse?

18 A. The infirmarium nurse is basically, she's in
19 charge of whomever is up in the infirmarium for whatever
20 reason. And if, for example, the med nurse was out
21 doing a med run, obviously not on a Wednesday, I would
22 have been doing transit. We kind of all just worked
23 together. If we weren't busy, that was the First Aid
24 nurse that would step down and take care of emergency
25 sick calls or sick calls, medical emergencies.

1 Q. Okay. And you testified earlier that at some
2 point -- I want to make sure I use your phrasing --
3 that you were at the truck trap when Mr. Raymond was
4 returning from the hospital; is that right?

5 A. Correct, right inside the door, yes.

6 Q. Okay. And so why were you at the truck trap
7 at that moment?

8 A. Well, it's just kind of this open area. So
9 if you are walking around in that First Aid area, you
10 see it's right there.

11 Q. Got it.

12 And let me just ask the question in a
13 different way. Nobody ordered you to go meet the van?
14 You just happened to be there?

15 A. Oh, no, no, no, no, correct.

16 Q. Got it.

17 So at the time you were in the truck trap
18 until you saw Mr. Raymond, you didn't know he had been
19 at the hospital or had any seizure issues that day;
20 isn't that right?

21 A. No, because I did know that he was sent out,
22 because as I explained earlier, if an inmate were to
23 leave for a hospital, they leave that inmate's file
24 sitting on the little table. So we know that they are
25 out and either, A, expect them to come back; or B, get

1 Q. I see. So you could see because Sergeant
2 Harte was walking backwards with the camera --

3 A. Correct.

4 Q. -- as he was videotaping? Okay.

5 And you testified earlier that at that point
6 you went into the exam room to do an examination of
7 Mr. Raymond as was your practice?

8 A. Yes.

9 Q. Okay. And you said you were in the room for
10 about a minute before Lieutenant Mitchell told you you
11 had to leave?

12 A. Mm-hmm, yes.

13 Q. And you said during that minute that you saw
14 Sergeant Harte holding the videocamera in the room
15 still, right?

16 A. Correct.

17 Q. How was he holding it at that time?

18 A. He was just to the right of the room, just
19 holding the camera like he's videotaping and just, you
20 know, it's aimed at the inmate, or Mr. Raymond.

21 Q. So when you walked in, you saw Sergeant Harte
22 pointing his videocamera at Mr. Raymond while he was in
23 the exam room?

24 A. Correct.

25 Q. Okay. And at the time you left the exam room

1 when Lieutenant Mitchell told to you leave, Sergeant
2 Harte was still pointing his videocamera at
3 Mr. Raymond, right?

4 A. Correct.

5 Q. You testified earlier that you went back to
6 review some discharge papers at the nurse's station
7 after you left the exam room. Do I have that right?

8 A. Yes.

9 Q. Okay. About how long did you spend reviewing
10 those papers?

11 A. Approximately ten minutes because I like to
12 flip -- I'm one of those nosey people. I had flipped
13 through not only the discharge paperwork, but also I go
14 through the AHRs, which are ambulatory health records,
15 just to see what happened up to this point? You know,
16 did they change his meds? Did they, you know, has this
17 been an ongoing, you know, event this week? You know,
18 I like to kind of flip back in the pages and see what
19 led up to this, basically.

20 Q. And you are saying "they." You said "they."
21 So let me back up for a minute.

22 A. Okay.

23 Q. When you were in the exam room, Mr. Raymond
24 was there, Mr. Mitchell was there. And Sergeant Harte
25 was there, correct?

1 A. Correct.

2 Q. Who else did you see in the room during the
3 minute you were in there?

4 A. There was approximately four other officers
5 in there.

6 Q. Do you know any of their names?

7 A. I know one was Charles Thomas. I'm not sure
8 as to the rest.

9 Q. And what were those other four officers doing
10 for the minute that you were in the room?

11 A. They were just standing around the exam
12 table.

13 Q. Was anyone touching Mr. Raymond at that point
14 for the minute you were in the exam room?

15 A. No. I mean, they pulled the little step out
16 and he stepped up and got on the exam table.

17 Q. And the step is a way to let inmates get on
18 the table?

19 A. Yes, it's the easier way.

20 Q. Okay. And Mr. Raymond was still shackled at
21 this point?

22 A. I know he had handcuffs on, yes.

23 Q. And you said earlier that Mr. Raymond and
24 Lieutenant Mitchell were yelling at each other, right?

25 A. Yes, yes.

1 anything?

2 A. Not that I'm aware of, no. It was mostly
3 Troy Mitchell.

4 Q. And so for the minute that you were in the
5 room at that time, Mr. Raymond and Mr. Mitchell were
6 yelling at one another, and the other five officers,
7 Sergeant Harte and the four officers were standing
8 around the table?

9 A. Correct.

10 Q. And based on what you saw, Sergeant Harte was
11 videotaping that entire cursing exchange?

12 A. Correct.

13 Q. So returning to your review of the discharge
14 papers, you said it took you about ten minutes?

15 A. Mm-hmm.

16 Q. At some point after that, did you go back
17 into the exam room?

18 A. Yes.

19 Q. When did you go back into the exam room?

20 A. When Troy came out and a couple of the other
21 guards came out, and he told me I could go in now and
22 do my assessment.

23 Q. And about how much time passed between your
24 leaving and your going back in?

25 A. Approximately ten minutes, 10, 15 minutes.

1 Q. And you said Mr. Mitchell came out, right?

2 A. Correct.

3 Q. You said some of the other officers came out;
4 is that also right?

5 A. Correct.

6 Q. Which officers, if you know, came out of the
7 exam room with Mr. Mitchell?

8 A. I do not know which ones came out.

9 Q. Did Sergeant Harte come out?

10 A. I do not recall that.

11 Q. When you went back into the exam room, did
12 you see Sergeant Harte standing inside?

13 A. I do not remember.

14 Q. At any point when you were back in the exam
15 room, did you see anyone videorecording Mr. Raymond?

16 A. Yes.

17 Q. Okay. Who did you see videorecording
18 Mr. Raymond when you went back into the exam room?

19 A. I could not tell you for sure if it was an
20 officer or if it was Sergeant Harte. I apologize.

21 Q. That's okay.

22 But you did see somebody pointing a
23 videocamera at Mr. Raymond when you went back into the
24 exam room ten minutes later?

25 A. Correct.

1 directed you; is that right?

2 A. Well, Troy Mitchell was starting to walk
3 away. And he had gloves on. He threw them in the
4 garbage. And I figured, okay, Troy Mitchell is going
5 that way, so maybe I can, you know, at least get
6 Mr. Raymond to calm down, you know. And I didn't, so I
7 felt safer going in there. How is that?

8 Q. And you felt safer, it sounds like, because
9 Mr. Mitchell was leaving that area?

10 A. Correct.

11 Q. Okay. You said he was wearing gloves. What
12 kind of gloves was he wearing?

13 A. Just latex gloves.

14 Q. Okay. Did Lieutenant Mitchell have those
15 gloves on the first time you were in the exam room?

16 A. No.

17 Q. Okay. So he must have put them on in the ten
18 minutes that you were away from the exam room?

19 A. Correct.

20 Q. And you said he threw them away?

21 A. Correct.

22 Q. Did you see anything on the gloves?

23 A. There was some discolorment.

24 Q. What color did you see?

25 A. I couldn't actually see it clearly. He just

1 took them off and threw them in the garbage by the
2 officer's desk.

3 Q. And did the gloves look bloody to you?

4 A. There was a darker discoloration, but I
5 cannot say if it was blood or not.

6 Q. What color were the gloves normally?

7 A. They are basically just, like, the white
8 light vanilla-colored gloves.

9 Q. So after you saw Mr. Mitchell throw away his
10 gloves and walk down the hallway in a different
11 direction, you reentered the exam room, right?

12 A. Correct.

13 Q. And you said you remembered at that point
14 someone was still pointing a videocamera at
15 Mr. Raymond?

16 A. Correct.

17 Q. What sticks in your mind about seeing that?
18 Why do you remember seeing a videotape or the
19 videocamera being pointed at Mr. Raymond?

20 A. It's not my area of expertise, but when you
21 have a use of force, that inmate is to be videotaped
22 until they get to their final destination. You know,
23 whether it's back out to -- well, usually if there's a
24 use of force, they go to SHU which is the Special
25 Housing Unit. So they videotape the entire thing after

1 that point?

2 A. Correct.

3 Q. And you knew he hadn't gotten to whether it
4 was SHU or back to his cell or wherever he was going?

5 A. Correct.

6 Q. And you understood that it was policy that
7 the officers were to continue recording until
8 Mr. Raymond reached that end point after the use of
9 force?

10 A. Correct.

11 Q. And was Sergeant -- I'm sorry, was
12 Officer Thomas still in the exam room when you went
13 back inside?

14 A. I am unsure of that.

15 Q. Do you remember anybody's name who was still
16 inside other than Mr. Raymond?

17 A. No, I do not.

18 Q. Do you remember about how many officers were
19 still in the room with Mr. Raymond?

20 A. At least two.

21 Q. And was Mr. Raymond, what position was
22 Mr. Raymond in when you got back into the exam room?

23 A. He was still sitting on the edge of the exam
24 table, just sitting there.

25 Q. Okay. Was he still shackled?

1 A. Yes, he still had handcuffs on.

2 Q. Did you see a black box on Mr. Raymond?

3 A. I do not recall seeing that.

4 Q. Okay. Did you do a visual scan of

5 Mr. Raymond when you entered the room?

6 A. Yes.

7 Q. And what did you see?

8 A. Well, he was angry. And that was the first
9 thing I noticed. And I don't know. He was somewhat
10 crying, but I don't know if it was crying because he
11 was so enraged at that point or if it he was crying
12 because he felt like he was hurt. He did have a mark,
13 I want to say it was over his, like, on the left
14 orbital bone. And then when I assessed his body, he
15 just had, like, red marks on his upper trunk and his
16 arms.

17 Q. So I am going to, as we talk about this, just
18 show you another document that's already been marked as
19 Plaintiff's Exhibit 41.

20 A. Okay.

21 Q. So you can see it says Plaintiff's Exhibit 41
22 there. And this is a document that is Bates stamped
23 P357.

24 And Ms. Hoppins, we are going to look at this
25 top entry from 4:25 p.m. on 9/14/16. Is this your

1 handwriting?

2 A. Yes, it is.

3 Q. And that's your signature down at the bottom
4 left?

5 A. Correct.

6 Q. Okay. So I want to just point you down to
7 some text that appears by "Plan." You wrote, "Has
8 reddened and swollen area to left eye, left cheek and
9 left ear, abrasions to upper right chest times two."

10 Do you see that?

11 A. Yeah.

12 Q. And is that a recording of what you observed
13 from looking at Mr. Raymond when you were back in the
14 exam room?

15 A. Yes.

16 Q. Okay. And you wrote, "No other injuries
17 noted or reported during visual assessment."

18 A. Correct.

19 Q. Okay. We can pause looking at that for a
20 moment.

21 And the marks that you saw on Mr. Raymond
22 when you went back into the exam room, you had not seen
23 those marks on him the first time you were in the exam
24 room, right?

25 A. Say that again? I'm sorry.

1 Q. Sure.

2 So you just testified that you saw some marks
3 on Mr. Raymond's face and body when you went into the
4 exam room the second time, right?

5 A. Yes, yes, yes, yes.

6 Q. Okay. You didn't see those marks the first
7 time you went into the exam room, right?

8 A. No, I did not.

9 Q. Okay. And did you do a physical examination
10 of Mr. Raymond when you were in the exam room the
11 second time, or did you just scan him visually?

12 A. I do believe I took his vitals, asked him how
13 he was doing. I was trying -- I was trying to talk to
14 him so he would calm down a little bit, you know,
15 because he was still angry, definitely. And it makes
16 my job easier. It makes me feel safer if they are calm
17 and they are collective and, you know, then I can do my
18 job feeling safe, you know. So that was my visual.

19 Q. And did you feel like Mr. Raymond calmed down
20 at all?

21 A. Not by much, but I was trying.

22 Q. Okay. You said you asked Mr. Raymond how he
23 was doing. What did he say to you?

24 A. Really nothing.

25 Q. Was he talking at all when you were doing

1 watching it on?

2 A. Correct.

3 Q. And you testified that you saw a portion of
4 the video of while Mr. Raymond was in the van?

5 A. You would have to repeat that. You just
6 blanked out.

7 Q. Oh, I'm sorry.

8 You testified earlier that you saw a portion
9 of the videorecording that showed Matt in the van on
10 his way back to Auburn?

11 A. Correct.

12 Q. Correct? Okay.

13 And if we can just both do our best to wait
14 for the other to finish. I know it's very hard.

15 A. You keep coming and going. It's blinking
16 out.

17 Q. Yeah, we are both I think having some
18 difficulties.

19 A. I'm sorry.

20 Q. It is okay. Let's just do the best that we
21 can.

22 A. Okay.

23 Q. What did Mr. Mitchell say to you as you were
24 both watching part of the video together?

25 A. He had told me that they were, the officers

1 and himself were going to write that he had a seizure
2 in the van and that that's how he had obtained the
3 swelling.

4 Q. And you said in response to that that
5 couldn't be how he got the swelling?

6 A. Right.

7 Q. Go ahead.

8 A. Sorry.

9 Q. No, no, it's okay. Go ahead.

10 A. I said you cannot justify that because that,
11 it doesn't work. You know, it would have, it would
12 have been the right side of his face, if anything, that
13 got damaged.

14 Q. And when Mr. Mitchell said to you they were
15 going to write that he had a seizure in the van, did he
16 refer to what happened to Matt as swelling or what word
17 did he use?

18 A. I don't recall what he actually said as far
19 as what his injuries were.

20 Q. And based on your assessment of Matt, you
21 testified that the injuries you saw on his body
22 couldn't have come from what happened in the van,
23 right?

24 A. Correct.

25 Q. And what did Lieutenant Mitchell say to you

1 when you told him that?

2 A. "When you told him?"

3 Q. So let me back up and break it down.

4 A. You are bleeping out.

5 Q. I'm sorry.

6 MS. FREEMAN: So let me try this. If folks
7 don't mind giving me just a moment, let me just shut my
8 Zoom down and come back on, and maybe if there's
9 something on my end that will help. So we can all
10 just, we don't need to take a break. It will just take
11 me 30 seconds, so hang on one moment.

12 (Brief pause.)

13 MS. FREEMAN: All right. Maybe I've
14 troubleshot this. I should be having perfect internet
15 in the office, but maybe this will help.

16 BY MS. FREEMAN:

17 Q. Ms. Hoppins, you testified that you said to
18 Mr. Mitchell you can't justify the swelling in that
19 way, right?

20 A. Correct.

21 Q. And what did Mr. Mitchell say to you in
22 response?

23 A. He said well, we will get -- I can't remember
24 his exact words. It was either we will get rid of the
25 video or the video is gone.

1 Q. So what you wrote about Matt's injuries was
2 true and accurate?

3 A. Correct.

4 Q. Why did Mr. Mitchell say to you we'll get rid
5 of the video, if you know?

6 A. I don't know.

7 Q. Do you have any suspicions?

8 MS. BUTH: I object to that. You are asking
9 her to guess.

10 BY MS. FREEMAN:

11 Q. What did you think at the time when he said
12 that to you?

13 A. Honestly I thought it was Troy just being
14 Troy again, Troy Mitchell and his ludicrous actions,
15 minds, thoughts.

16 Q. Did you think something had happened to
17 Mr. Raymond while you were out of the exam room?

18 MS. BUTH: I object to this. Go ahead and
19 answer.

20 A. I did not hear the question completely.

21 Q. I said, did you think something had happened
22 to Mr. Raymond while you were gone from the exam room
23 for that 10-minute period?

24 A. It was obvious that something had occurred.

25 Q. Did you feel as though Mr. Raymond -- I'm

1 Q. Understood.

2 A. But everything I have told you today,
3 everything I have told you today is my actual truth.

4 Q. And everything you wrote down in medical
5 records or in written reports, also true?

6 A. That's correct.

7 Q. And Ms. Hoppins, is there anything about your
8 communications with Lieutenant Mitchell involving
9 Mr. Raymond that you haven't testified about today?

10 A. I do not believe so, no.

11 Q. Ms. Hoppins, after the September 14, 2016,
12 incident, are you aware that Mr. Raymond experienced
13 certain medical problems?

14 A. He did not mention any to myself.

15 Q. Okay. Did you offer medical treatment to
16 Mr. Raymond after the incident at any point?

17 A. No. You know, just looked at his face,
18 examined it, gave him a glove full of ice. Because we
19 don't have ice bags, so we have to fill them in gloves.
20 And then he was off to the SHU.

21 Q. And in the months following the incident, did
22 you see Mr. Raymond for medical appointments for any
23 reason?

24 A. I could have. I know one other time that I
25 did see him for a fact. For a fact, I know I saw him

1 during that second visit, did you notice if in his
2 groin area if there was any evidence of blood or
3 anything like that?

4 A. No, I did not.

5 Q. Now, it was during this second visit to the
6 exam room after you waited ten minutes is when you saw
7 some marks on Mr. Raymond's face, correct?

8 A. Correct.

9 Q. Okay. Could you explain again what did you
10 see on his face? What marks did you see?

11 A. Well, basically I call it the orbital bone.
12 That's the medical terminology for it (indicating).
13 But it's, like, right on your eyebrow and kind of
14 circles around. So that was swollen. His cheek was a
15 little swollen. And his ear was reddened, you know.
16 And then he had, like, I said just red marks. Like, I
17 think I called them abrasions, but they are really not.
18 It's almost like having a sunburn. How is that? So
19 that kind of rash and just different spots, you know
20 what I mean?

21 Q. Okay. I am going to break down my questions
22 in relation to these injuries. You mentioned there was
23 an injury to the orbital bone. Is it his left side?

24 A. Yes.

25 Q. And was it just swelling or was there more

1 marks than just the swelling?

2 A. No, it was just swelling. It didn't split.

3 Q. Okay. So there was no blood?

4 A. No.

5 Q. And I think you said there was injuries to
6 the left side of his face kind of like to his jaw; is
7 that correct?

8 A. Yeah. It was just a little swollen.

9 Q. Okay. Was there anything other than the
10 swelling injury? Was there any blood or anything like
11 that?

12 A. No, no, there wasn't.

13 Q. Was there signs of any scratches or anything
14 like that on his jaw?

15 A. You would have to repeat that. I'm sorry.

16 Q. Sure. Was there signs of any scratching on
17 his jaw?

18 A. I do not recall that, no.

19 Q. Okay. Let me go back to the injury above his
20 forehead. Was there any scratching, any signs of
21 scratching there?

22 A. On his face?

23 Q. On the orbital bone.

24 A. No.

25 Q. So just more swelling and redness?

1 wrapped around I guess you would want to call it, like,
2 the clavicle area where the upper right forearm to the
3 shoulder blade, the top of the shoulder blade on the
4 left.

5 Q. Okay. Was it just swelling or was it just
6 reddened?

7 A. Yeah, it was just red marks.

8 Q. Okay. Was there any blood?

9 A. No.

10 Q. Okay. Was there any evidence of, like,
11 scratching or anything like that?

12 A. Not that I saw, no.

13 Q. Okay. I think you mentioned earlier this is
14 the portion that kind of was just a sunburn?

15 A. Yeah, that's how I described the reddened
16 area.

17 Q. Now, these injuries that you saw on
18 Mr. Raymond's face and shoulder on your second visit to
19 the exam room, did you see any of these injuries when
20 you first went into the exam room?

21 A. When I first -- I could obviously see his
22 face, yes.

23 Q. Okay. Did you see any of those injuries on
24 the first visit to the exam room?

25 A. The first visit I was told to leave, so no.

1 me know.

2 When you saw Mr. Raymond in his boxers, you
3 did an additional assessment of his body, correct?

4 A. Correct.

5 Q. And what other injuries other than his face
6 injury and shoulder injury did you see on him?

7 A. That's when I saw the reddened marks as well.

8 Q. On his shoulder?

9 A. On his shoulder and like I said, the back. I
10 can't remember if it was right or left, and on the
11 shoulder blade itself.

12 Q. What did you actually see on his back?

13 A. There was the reddened that we had referred
14 to earlier.

15 Q. Was it just from his shoulder?

16 A. That I called a sunburn.

17 Q. Okay. Was that, when you saw Mr. Raymond in
18 his boxers, the injury you saw on his back, was that
19 just kind of a continuation of the injury on his
20 shoulder?

21 A. I am going to say yes, but I can't for
22 positive say yes or no.

23 Q. How far down his back did it go, the
24 reddened?

25 A. Like I said, the one was more like upper

1 forearm, clavicle area, and upper right shoulder blade.
2 And I can't remember if it was another one actually
3 on -- did I just say "right"? I meant left, left, or
4 if it was on the right. But it was on the shoulder
5 blade. Excuse me. Please fix that.

6 Q. Okay. So the injury on the back didn't go
7 below his shoulder blade?

8 A. Yeah, like right on the actual shoulder
9 blade.

10 Q. The blade in the back?

11 A. Yes.

12 Q. Now, when you went the third time into the
13 exam room and Mr. Raymond was in his boxers, did you
14 notice if his boxers were wet or bloody at all?

15 A. No, they were not.

16 Q. They were not?

17 A. No, they were not.

18 Q. Now, when you first went into the exam room
19 to see Mr. Raymond, did you walk into the exam room
20 right after Mr. Raymond and Lieutenant Mitchell walked
21 in?

22 A. Well, I let the COs, you know, take him and
23 put him on the exam table.

24 Q. I asked did you walk in right behind
25 Mr. Raymond and Lieutenant Mitchell?